PUBLIC COMMENT ON DRAFT MONTANA SWIFT FOX CONSERVATION STRATEGY
July 16, 2018

1 Halt the current trapping of swift fox until we better understand the current population and situation of these creatures. It is not good management to do otherwise. Marc Cooke
Montana Citizen Stevensville MT

2 If in fact the Swift Fox population has dropped by 2/3 in recent years, the reintroduction effort has been a failure and the trapping quota should be reduced to ZERO. Allowing further hunting of an animal whose population is in such decline is not smart conservation strategy at all. This animal will once again be extirpated from Montana if this continues, a waste of life and tax payer dollars. NO MORE TRAPPING OF THE SWIFT FOX SHOULD BE ALLOWED.Kelly Sweeney
Glencoe CA

3 These precious little creatures, the Swift fox,are protected in Alberta and Saskatchewan, it is illegal to trap them!! As it should be. Trapping is barbaric, causing enormous pain and suffering to these animals, please follow these states' civilized and humane example! Anna Brewer
Fountain MI

4 American Prairie Reserve Public Comment on Montana Fish Wildlife & Park's Montana Swift Fox Conservation Strategy Swift foxes were eradicated from Montana by 1969 due to the misguided management practices of a previous century. Presently we have the opportunity to restore this native species and conserve biodiversity for the benefit of the state's citizens. American Prairie Reserve's mission is to protect and restore native prairie. The State's Swift Fox Conservation Strategy and our mission are well-aligned, and we support this conservation strategy. We endorse that the planned actions outlined in the Montana State Swift Fox Conservation Strategy promote responsible swift fox management, and are in line with the eight objectives developed by the Swift Fox Conservation Team [1]. Moreover, we applaud the State's effort to take a proactive approach to swift fox conservation in Montana. Given that swift foxes are listed as a species of concern in the state (S3) and declining, and that continental population of swift foxes is divided by a 350-km gap of unoccupied habitat [2-4], active management to conserve habitat, and re-establish additional populations of swift foxes, especially into this gap in Montana is crucial to supporting the persistence of this species.
We support each of the four priorities laid out in the Strategy. However, we caution that these priorities should not be viewed as mutually exclusive, ranked, or sequential. Instead, all components are necessary to achieve a robust and sustainable population of swift foxes statewide and can be pursued concurrently.

Priority 1: Identify and Map Swift Fox Habitat in Montana
Priority 1, in particular, should be approached with caution as it has the potential to become a barrier to progress. We agree that understanding the habitat requirements and distribution of a species is paramount to developing a quality management plan. Swift fox habitat, both range-wide and specifically in Montana, has been a matter of investigation for decades and these

investigations have produced multiple models. Rather than being contradictions, these models represent an evolution of knowledge, and build on of each other to provide a continually improving concept of what constitutes the best habitat for swift foxes. The most current model, developed by the World Wildlife Fund and updated in 2017, is state of the art, rigorous and represents the best available science. This model should be considered the best representation of swift fox habitat suitability in the state.

Strategy 1A notes that "the amount and size of sage brush and the degree of agricultural crops that swift fox can tolerate is unclear." This species' use of both sage brush habitat and agricultural crop land have already been researched in other parts of the species range (e.g. sage brush: Olson and Lindzey [5], crop land: Sovada et al., 2001, 1998 [6-7]). We support investigation into the species' use of these habitat types, if approached in a way that enhances and refines existing knowledge, rather than duplicating previously published work.

Strategy 1B highlights an essential component of a statewide strategy. Identifying, and conserving, corridors for connectivity between populations is an imperative component of maintaining a genetically robust and resilient population.

Priority 2: Conserve Swift Fox Habitat and Movement Corridors

Strategy 2B recommends that "efforts should be implemented to maintain interest and cooperation with private landowners". American Prairie Reserve, a large private land owner, is interested in restoring swift fox on our property. We look forward to cooperating with the State on this effort, which will expand the distribution of swift foxes on private land, and position foxes in a potential dispersal corridor which facilitates connectivity between existing reintroduced populations at the Blackfeet Indian Reservation and Fort Peck Indian Reservation.

Priority 3: Monitor Swift Fox Distribution/Status

We agree that the current components of the state's monitoring efforts (primarily the International census) are valuable in assessing population status, but insufficient to comprehensively inform management. We recommend the State expand its nascent GPS/VHF collaring and monitoring effort. Intensive monitoring can specifically support strategy 1B, in that it allows wildlife managers to achieve the stated goal of "identifying habitat features and mortality factors that limit or aid dispersal." Similarly, conserving habitat and movement corridors (Priority 2) requires knowledge of what constitutes utilized habitat (Priority 1). Intensive monitoring will inform both priorities 1 and 2—further highlighting the importance of not viewing the listed priorities as sequential steps.

Priority 4: Increase Distribution of Swift Fox into Suitable, Connected Habitats

While surveying, identifying and preserving habitat (priorities 1-3) form the foundation of any good management plan, these actions have proved insufficient to restore the statewide

population of swift foxes. The Strategy notes that in an ideal world, swift foxes would increase and disperse on their own. We agree with this sentiment, but such a scenario is far from reality. The breeding populations of swift fox that currently exist in Montana are solely the product of reintroductions. The Canadian reintroduction effort that produced the population near the international border ended in 1997 [8]. Since that time, multiple surveys indicate that the area occupied by this population has not measurably increased in the state and in the last survey, declined [9-10, 3]. Reintroductions have proven to be the only effective means of expanding swift fox distribution in the Montana, and authors of multiple studies on this species call for active translocation of swift foxes as the only way to improve their distribution (e.g. [4,11]). Reintroductions serve multiple goals, as they inherently help expand the species' distribution, but also provide information on habitat selection (Priority 1) and if properly publicized, can foster public support for swift fox expansion (Strategy 4A). Therefore, as previously iterated, we support the State's Strategy, and urge FWP to pursue each of these priorities concurrently, as each of these actions can inform the others, allowing for continual refinement while making progress to restore and maintain the statewide population of swift foxes, while avoiding costly duplication of effort.

Signed: Colleen Crill Swift Fox Restoration Specialist American Prairie Reserve Daniel Kinka Wildlife Restoration Manager American Prairie Reserve Kyran Kunkel Director of Wildlife Restoration & Science American Prairie Reserve

References [1] Dowd Stukel, E., ed. (2011). Conservation assessment and conservation strategy for swift fox in the United States – 2011 Update. South Dakota Department of Game, Fish and Parks, Pierre, South Dakota. [2] Montana Natural Heritage Program and Montana Fish, Wildlife and Parks. Swift Fox — Vulpes velox. Montana Field Guide. Retrieved on July 13, 2018, from http://FieldGuide.mt.gov/speciesDetail.aspx?elcode=AMAJA03030 [3] Moehrenschlager A., and Moehrenschlager, C. (2018). Population survey of reintroduced swift foxes (Vulpes velox) in Canada and northern Montana 2014/2015. Centre for Conservation Research, Calgary Zoological Society, Calgary, Alberta, Canada. [4] Alexander, J.L., S.K. Olimb, K.L.S. Bly and M. Restani. (2016). Use of least-cost path analysis to identify movement corridors of swift foxes in Montana. Journal of Mammalogy 97: 891-898. [5] Olson, T.L and F.G. Lindzey. 2002. Swift fox survival and production in southeastern Wyoming. Journal of Mammalogy 83:199-206. [6] Sovada, M.A., C.C. Roy, J.B. Bright, and J.R. Gillis. 1998. Causes and rates of mortality of swift foxes in Kansas. Journal of Wildlife Management 62:1300-1306. [7] Sovada, M.A., C.C. Roy, and D.J. Telesco. 2001. Seasonal food habits of swift fox in cropland and rangeland habitats in western Kansas. American Midland Naturalist 145:101-111. [8] Carbyn. L. N. (1998). Update COSEWIC status report on the Swift Fox Vulpes vulpes in Canada. Committee on the Status of Endangered Species in Canada, Ottawa, 1-44 pp. [9] Moehrenschlager, A. and C. Moehrenschlager. 2001. Census of Swift Fox (Vulpes velox) in Canada and Northern Montana: 2000-2001. Alberta Sustainable Resource Development, Fish and Wildlife Division, Alberta Species at Risk Report No. 24. Edmonton, Alberta. 21 pp. [10] Moehrenschlager, A. and C. Moehrenschlager. 2006. Population census of reintroduced swift fox (Vulpes velox) in Canada and Northern Montana: 2005/2006. Report to Alberta Sustainable Resource Development and The Alberta Conservation Association. Edmonton, Alberta. [11] Bly, K., Reed, C., Janz, S. (2010).

Assessment of swift fox (Vulpes velox) occurrence in South Phillips and Valley Counties, Montana. Unpublished Report. World Wildlife Fund, Bozeman Montana, USA. Colleen Crill American Prairie Reserve Bozeman MT

5 Montana has attempted to reintroduce the little cat sized swift fox three times now. Approximately 1,000 captive bred swift fox were released into Montana along the Canadian border between 1983-1997. Another roughly 200 were released on to two Native American Reservations in 1998-2002 and 2006-2010. The war on wolves and coyotes had formerly extirpated the swift fox in Montana. According to the USFWS the little native prairie grasslands swift fox are also very easy to trap. Compound that with their very curious nature and you have the perfect storm to easily award yourself with a whooping $7 swift fox pelt. Yes, you read that right. Seven dollars! What did it cost to reintroduce them and what will it cost now if they continue to decline? In the 2016/2017 trapping proposals, the quota on swift fox was reduced from 30 to 10 which was reflective of the averages reported trapped and killed over the years since Montana resurrected trapping them. TFMPL expressed concern publicly then to the Commissioners whether this kill rate was reflective of the low population or low interest of trappers. Now evidence points to our bigger fear. At the June 14th Commissioners hearing, TFMPL was the only voice speaking up again for the swift fox urging a 0 quota and questioning why are they being trapped to begin with? Our concerns and advocacy continue to fall on deaf ears. Another 10 swift fox were reported legally intentionally trapped this past furbearer season, killing, again, the new allowable quota. The lower the number in a population, the more each and every individual matters for the recovery, distribution and health of the species! The 2015 census estimates though only 175 swift fox in Montana! We cannot have a legitimate conservation strategy for the declining swift fox encompassing the stated goals for population monitoring, dispersal, and habitat acquisition, yet continue to trap them! Note, the time in which swift fox venture off to claim new areas is just prior to the mating season, i.e. Feb/March. Montana trapping season on swift fox runs NOV1-MAR1 unless the quota is reached. Please INSIST ON A 0 QUOTA FOR SWIFT FOX, otherwise CONSERVATION & RECOVERY is a farce! Jessica Black Denver CO

6 A zero quota on swift fox! If not, your conservation strategy is a lie. Mary Shabbott Punta Gorda FL

7 In order for there to be an effective and responsible swift fox conservation strategy a known means of mortality, trapping, must be eliminated by discontinuing/closing the trapping of swift fox. Given the last census of only 175 swift fox in 2015 each and every individual matters that much more. A quota of 10 is therefore unacceptable. Since the goals for the swift fox are to increase dispersal and distribution and increase occupancy, it is scientifically counterproductive to continue trapping and killing them. Trapping is market driven and while Montana lists no value for their fur, elsewhere swift fox were only trading a $7 a pelt. Unless Montana wants to head back down a road of potential listing and hence more costly reintroduction, a trapping moratorium on swift fox is necessary and just. KC York Trap Free Montana Public Lands Hamilton MT

8 I se no reason to trap theses animals especially when they are deminishing in numbers. Please sttop before they are gone! Ann Machek Stevensville MT

9 I support research, funding, and habitat preservation for the Swift Fox. Robert P Griffin West yellowstone MT

10 There is absolutly no reason to kill a fox. They hurt nothing and only help our eco systems. If they take someones chickens it is because they are a lazy ass who won't take the precautions to fence them. Sheryl Hester Oro Valley AZ